

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DAVID WHITT,

Plaintiff,

v.

CITY OF ST. LOUIS, et al.,

Defendants.

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Case No. 4:18-CV-01294

DEFENDANTS' CONSENT MOTION TO EXTEND THE DISCOVERY DEADLINE

Defendants City of St. Louis, Detective Bobby D. Baine, Sergeant Matthew T. Karnowski, Officer Ryan J. Linhorst, and Officer Matthew A. Shaw, through counsel, hereby move this Court to extend the discovery deadline to January 25, 2021. In support of their motion, Defendants state as follows:

1. According to the Court's Second Amended Case Management Order, the discovery deadline in this matter is Thursday, December 10, 2020. (Doc. 74).
2. On October 20, 2020, Defendants filed a motion for protective order regarding several topics of Plaintiff's deposition notice for corporate representative. (Doc. 83). Within their protective order, Defendants described that providing a corporate representative to speak about Plaintiff's topic no. 19 would involve a lengthy review process of approximately six weeks. (See Doc. 83, p. 7-8).
3. On December 4, 2020, this Court denied Defendants' motion for protective order. (Doc. 88).
4. In order to comply with this Court's order, Defendants require additional time beyond the discovery deadline.

5. Moreover, Defendants served a witness identified by Plaintiff with a subpoena for deposition scheduled for December 9, 2020 and opposing counsel has requested the deposition be rescheduled due to a scheduling conflict. Hence, an extension of the discovery deadline is necessary, in part, to accommodate opposing counsel's schedule.
6. Based on the above, Defendants request the discovery deadline be extended from December 10, 2020 to January 25, 2021.
7. Plaintiff consents to this motion.
8. Defendants affirm that this request is for good cause and not for the purpose of undue delay.

WHEREFORE, Defendants request this Court extend the discovery deadline in this matter to January 25, 2021, and for any other relief this Court deems just and proper under the circumstances.

Respectfully Submitted,

MICHAEL GARVIN
CITY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify the foregoing was electronically filed on December 10, 2020 with the Court for service by means of Notice of Electronic Filing upon all attorneys of record.

/s/ Abby Duncan